

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**IN RE IGLOO PRODUCTS COOLER
RECALL LITIGATION**

Civil Action No.: 1:25-cv-00298-JLH-EGT
CONSOLIDATED

STIPULATION AND [PROPOSED] ORDER REGARDING PENDING MOTIONS

WHEREAS, Plaintiffs filed the Consolidated Class Action Complaint (“Consolidated Complaint”) on October 21, 2025 (D.I. 58);

WHEREAS, Defendant Igloo Products Corporation (“Defendant”) filed its Motion to Dismiss Consolidated Class Action Complaint (ECF No. 62) and Motion to Strike Nationwide Class Allegations Pursuant to Rule 23(d)(1)(D) (ECF No. 64) on November 20, 2025;

WHEREAS, although the parties previously stipulated to a briefing schedule on Defendant’s anticipated motion to dismiss that was subsequently entered by the Court, the stipulation did not include a deadline for Defendant’s reply in support of the motion to dismiss and permitted the Plaintiffs’ thirty (30) days to respond to Defendant’s Motion to Dismiss Consolidated Class Action Complaint;

WHEREAS, the parties further stipulated, and the Court did order, Defendant’s reply to be filed twenty-one (21) days after Plaintiffs’ opposition (ECF No. 60);

WHEREAS, the Court’s orders have not contemplated Defendant’s Motion to Strike Nationwide Class Allegations, and did not designate dates to the corresponding deadlines;

WHEREAS, so there is no confusion, the parties have conferred and have agreed that Plaintiffs' response to both Motion to Dismiss Consolidated Class Action Complaint (ECF No. 62) and Motion to Strike Nationwide Class Allegations Pursuant to Rule 23(d)(1)(D) (ECF No. 64) are due December 22, 2025, and any replies filed by Defendant are due January 12, 2026.

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that:

- 1) Plaintiffs' oppositions to Motion to Dismiss Consolidated Class Action Complaint (ECF No. 62) and Motion to Strike Nationwide Class Allegations Pursuant to Rule 23(d)(1)(D) (ECF No. 64) are due December 22, 2025; and
- 2) Defendant's replies in support of Motion to Dismiss Consolidated Class Action Complaint (ECF No. 62) and Motion to Strike Nationwide Class Allegations Pursuant to Rule 23(d)(1)(D) (ECF No. 64) are due January 12, 2026.

Dated: December 3, 2025

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SO ORDERED this _____ day of December 2025.

UNITED STATES MAGISTRATE JUDGE